

1 JAMES B. CHANIN (SBN# 76043)
2 JULIE M. HOUK (SBN# 114968)
3 Law Offices of James B. Chanin
4 3050 Shattuck Avenue
5 Berkeley, California 94705
6 Telephone: (510) 848-4752
7 Facsimile: (510) 848-5819
8 Email: jbcfc@aol.com

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10 Attorneys for Plaintiffs

11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA

13
14 JACK ZOLOWICZ, et al.,) Case No.: C06-05915 MJJ
15 Plaintiff,)
16 vs.) STIPULATION AND [PROPOSED]
17 CITY OF OAKLAND, et al.,) ORDER EXTENDING TIME FOR
18 Defendants.) EXPERT DISCLOSURE, RULE 26
19) REPORTS AND COMPLETION OF
20) EXPERT DISCOVERY
21)
22)
23)
24)

ed
25 WHEREAS, the parties have recently completed a large number of depositions which
26 will need to be reviewed by the parties respective experts;

27 WHEREAS, the Honorable Maria Elena James is currently reviewing a number of
28 confidential police department documents *in camera* which, if ordered compelled, will need to
29 be reviewed and considered by the parties' respective police practices experts;

30 WHEREAS, the parties have recently stipulated that they may disclose three expert
31 witnesses instead of two;

1 WHEREAS, the parties are contemplating additional fact witness depositions which may
2 also need to be provided to their liability and/or damage experts; and

3 WHEREAS, the parties need additional time for their expert witnesses to complete their
4 respective Rule 26 reports in light of the foregoing,

5 WHEREAS, the parties have agreed to attend a further mediation session before Scott
6 Emblidge on September 18, 2007, and wish to avoid incurring substantial expert witness costs
7 which may hinder settlement discussions as said further mediation session,

8 THE PARTIES, BY AND THROUGH THEIR COUNSEL OF RECORD, DO HEREBY
9 STIPULATE AND AGREE THAT:

10 The deadline for disclosure of the identities of expert witnesses shall be extended to
September 25, 2007;

11 The deadline for disclosure of expert witness Rule 26 reports shall be extended to
October 10, 2007; and,

12 The deadline for completion of expert discovery and depositions shall be extended to
October 31, 2007.

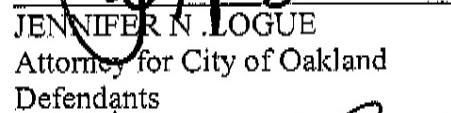
13 **However dispositive miton date nor trial dates will be continued. MMJ**
14 IT IS SO STIPULATED AND AGREED:

15 Dated: August 29, 2007



JAMES B. CHANIN
Attorney for Plaintiffs

16 Dated: August 29, 2007



JENNIFER N. LOGUE
Attorney for City of Oakland
Defendants

17 Dated: August 29, 2007



GEOFFREY A. BEATTY
Attorney for Defendant
Javier Roca

PURSUANT TO STIPULATION,
IT IS HEREBY ORDERED:

Dated: Sept 1, 2007

